

Amy J. Oliver (Utah #8785) (admitted *pro hac vice*)  
OliverA@sec.gov  
Daniel J. Wadley (Utah #10358) (admitted *pro hac vice*)  
WadleyD@sec.gov  
James J. Thibodeau (Utah #15473) (admitted *pro hac vice*)  
ThibodeauJ@sec.gov  
Attorneys for Plaintiff  
Securities and Exchange Commission  
Salt Lake Regional Office  
351 South West Temple  
Suite 6.100  
Salt Lake City, UT 84101-1950  
Tel.: (801) 524-5796  
Fax: (801) 524-3558

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

HEMP, INC. a Colorado Corporation;  
BRUCE J. PERLOWIN, an individual; BARRY  
K. EPLING, an individual; JED M. PERLOWIN,  
an individual; FERRIS HOLDING, INC., a private  
Nevada Corporation; HOBBS EQUITIES INC., a  
private Nevada Corporation; DIVERSIFIED  
INVESTMENTS LLC, a private Nevada Limited  
Liability Company; and QUANTUM ECONOMIC  
PROTOCOLS LLC, a private Nevada Limited  
Liability Company.

Defendants.

Case No. 2:16-cv-1413 JAD-PAL

**STIPIULATED MOTION TO AMEND  
THE SCHEDULING ORDER  
(First Request)**

Plaintiff, Securities and Exchange Commission (the “Commission”), hereby moves the Court to amend the previously entered Scheduling Order (Docket No. 40) by extending the dates for expert discovery and dispositive motions. Defendants Hemp, Inc., Bruce J. Perlowin, Barry K. Epling, Jed M. Perlowin, Ferris Holding, Inc., Hobbes Equities, Inc., Diversified Investments, LLC, and Quantum Economic Protocols, LLC, through their respective counsel, have all stipulated to the Plaintiff’s motion. This is the first stipulation for a motion to amend the scheduling order.

The reasons for this Motion are as follows. The parties are actively engaged in discovery, including the exchange of written discovery and the taking of numerous depositions. Most of these depositions will be taken either immediately preceding or after the current March 17, 2017 and April 17, 2017 deadlines for expert reports from the Plaintiff and the Defendants, respectively. Were the parties to maintain the current schedule for expert discovery, it would necessitate supplemental reports from experts and cause the parties to incur additional time and expense. Moving the expert deadlines would also necessitate allowing time for expert depositions after the exchange of expert reports as well as moving the deadline for the filing of dispositive motions so that the parties may have the benefit of completing expert discovery before the dispositive motion deadline.

Therefore, the parties have stipulated to move the following deadlines by 90 days as set forth below:

1. Plaintiff’s expert report(s) due on May 16, 2017.
2. Defendants’ expert report(s) due on June 15, 2017.
3. Discovery deadline for expert depositions on July 15, 2017.
4. Dispositive motion deadline on September 13, 2017.

**IT IS SO STIPULATED.**

Dated: February 13, 2017

s/Amy J. Oliver  
Amy J. Oliver  
Daniel J. Wadley  
James J. Thibodeau  
Attorneys for Plaintiff  
Securities and Exchange Commission

Dated: February 13, 2017

s/Jonathan D. Bletzacker  
Brent R. Baker  
Jonathan D. Bletzacker  
Attorney for Jed Perlowin, Diversified Investments  
LLC, Quantum Economic Protocols LLC

Dated: February 13, 2017

s/Thomas A. Sporkin  
Thomas A. Sporkin  
Timothy J. Coley  
Attorney for Bruce Perlowin, Hemp Inc., Barry  
Epling, Ferris Holding, Inc., Hobbes Equities Inc.

**IT IS SO ORDERED.**

  
HONORABLE PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

DATED: February 22, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of February, 2017, I served **STIPIULATED**  
**MOTION TO AMEND THE SCHEDULING ORDER (First Request)** to the following  
parties entitled to service via the Court's ECF system to the counsel indicated below:

Thomas A. Sporkin  
Timothy J. Coley  
BuckleySandler LLP  
1250 24<sup>th</sup> Street NW, Suite 700  
Washington D.C. 20037  
[tsporkin@buckleysandler.com](mailto:tsporkin@buckleysandler.com)  
[tcoley@buckleysandler.com](mailto:tcoley@buckleysandler.com)

Antony M. Santos  
A.M. Santos Law, CHTD  
3275 S. Jones Blvd. Ste 104  
Las Vegas, Nevada 89146  
[tony@amsantolaw.com](mailto:tony@amsantolaw.com)

Brent R. Baker  
Jonathan D. Bletzacker  
ClydeSnow  
One Utah Center  
Thirteenth Floor  
201 South Main Street  
Salt Lake City, Utah 84111  
[brb@clydesnow.com](mailto:brb@clydesnow.com)  
[jdb@clydesnow.com](mailto:jdb@clydesnow.com)

Jacob L. Fannesbeck  
Smith Correll, LLP  
3960 Howard Hughes Pkwy, Suite 500  
Las Vegas, Nevada 89169  
[jfannesbeck@smithcorrell.com](mailto:jfannesbeck@smithcorrell.com)